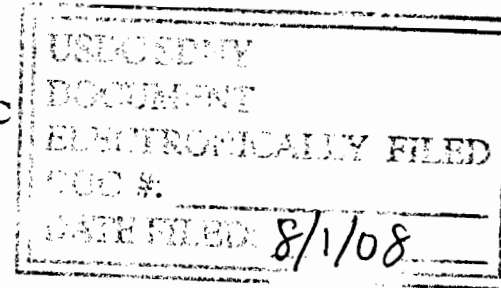


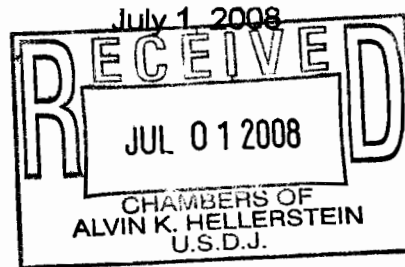
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Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: In Re Petition of National Security Archives, et al.

Misc. # 11-188 (Civ. # 08 Civ. 6588)

Dear Judge Hellerstein:

I am writing at the suggestion of your law clerk, Michelle Parikh. I represent David Greenglass and members of his family. Mr. Greenglass is one of the people who testified in front of the grand jury which considered the charges against Julius and Ethel Rosenberg in August, 1950.

Several months ago, the Greenglass family was contacted by Andrew McNeela, the AUSA representing the interests of the United State Government in this matter. He inquired, via a simple election form, whether David Greenglass would consent or not to the release of his grand jury testimony and Mr. Greenglass indicated that he would not consent.

On behalf of Mr. Greenglass and his family, I have been asked to submit materials to the court relating to their position on the release of Mr. Greenglass' grand jury testimony. Because, the gravamen of the material which would be submitted in support of the Greenglass family's position relates to personal privacy issues, promises of privacy and long held expectations of privacy, setting those positions forth in a public document, or even one available to the Movants in this action would undermine the very considerations which we need to protect. For this reason, we are seeking leave to file our materials ex-parte and under seal.

At this point, as I briefly discussed with Ms. Parikh, we only need some indication that our application to provide materials to Your Honor in anticipation of the July 22, 2008 hearing date will be accepted ex-parte and under seal. We have no desire, for obvious reasons, in participating in the public hearing which is

scheduled for July 22, 2008. We would, however, appreciate the opportunity to provide materials to the court in advance of that date.

Should you require additional briefing on this initial issue, I would be pleased to provide it, however, at this point, I intended merely to set out the issue for you. I am available to discuss this and any other issues at the number noted above.

Respectfully Submitted,


Daniel N. Arshack